

IN THE CIRCUIT COURT OF LEAKE COUNTY, MISSISSIPPI

LORRAINE SULLIVAN

PLAINTIFF

VS.

CAUSE NO.: 21-CV-078-LE-CM

WAL-MART STORES EAST, LP;
AND JOHN DOES 1-10

DEFENDANTS

PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST SET OF REQUEST FOR
ADMISSIONS

COMES NOW, the Plaintiff, Lorraine Sullivan (hereinafter sometimes referred to as Ms. Smith or Plaintiff), by and through her attorney(s) and files her Response to Wal-Mart Stores East, LP, Request for Admissions, herein pursuant to Rule 36 of the *Mississippi Rules of Civil Procedure*, and in answering would show unto the Court the following;

1. Admit that the value of your claims for damages do not exceed the amount of \$75,000.00.

RESPONSE: Denied.

2. Admit that you would not accept any sum greater than \$75,000.00 for any damages even if awarded by a jury.

RESPONSE: Denied.

3. Admit that you will never seek to amend the Complaint to seek an amount above \$75,000.00.

RESPONSE: Denied.

4. Admit that you will never seek a verdict from any jury hearing this action greater than \$75,000.00.

RESPONSE: Denied.

5. Admit that you will not seek a verdict in excess of \$75,000.00 exclusive of interest and cost at the trial of this matter.

EXHIBIT B

RESPONSE: Denied.

6. Admit that Walmart was not negligent as alleged in the Complaint in this matter.

RESPONSE: Denied.

7. Admit that Walmart is not liable for any injury allegedly sustained by Plaintiff.

RESPONSE: Denied.

8. Admit that the negligence of Plaintiff was the sole proximate cause of any injury to Plaintiff.

RESPONSE: Denied.


Respectfully submitted, this the 11th day of June, 2021.

LORRAINE SULLIVAN

By:


LORRAINE SULLIVAN

AS TO OBJECTION:


Harry M. McCumber, (MSB# 10632)
Morgan & Morgan, PLLC
4450 Old Canton Road, Suite 200
Jackson, Mississippi 39211
PHONE: (601) 718-0921
FAX: (601) 503-1627
EMAIL: hmcumber@forthepeople.com

CERTIFICATE OF SERVICE

I, Harry M. McCumber, hereby certify that I have e-mailed, a true and correct copy of the above and foregoing to:

Tom M. Louis, (MSB# 8484)
J. Caroline Johnson (MSB# 105674)
WELLS MARBLE & HURST, PLLC
POST OFFICE BOX 131
JACKSON, MISSISSIPPI 39205-0131
TELEPHONE: (601) 605-6900
FACSIMILE: (601) 605-6901
tlouis@wellsmarble.com
cjohnson@wellsmarble.com

This, the 11th day of June, 2021.



HARRY M. McCUMBER, Esq.